REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: April 25, 2012

ANALYST: Robin Kelly

I. COMMITTEE:

Carney for Congress

C00414391

Larry Golden, Treasurer

P.O. Box A

Clarks Summit, PA 18411

II. RELEVANT STATUTES:

11 CFR §§ 104.3(a) and (b)

2 U.S.C. §§ 434(b)(2) and (4)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Carney for Congress ("the Committee") amended its 2009 October Quarterly, 2010 October Quarterly, 2010 12 Day Pre-General and 2010 30 Day Post-General Reports to disclose additional receipts of \$5,103.15 and additional disbursements of \$273,170.63, which were not reported in the original reports (Attachments 1 and 2).

2009 October Quarterly Report

On October 15, 2009, the Committee filed the original 2009 October Quarterly Report covering the period from July 1, 2009 through September 30, 2009. The report disclosed no receipts on Line 12 (Transfers from Other Authorized Committees) of the Detailed Summary Page (Image 29992934941).

On January 6, 2011, the Committee filed an Amended 2009 October Quarterly Report. The report disclosed \$4,000.00 in receipts on Line 12 of the Detailed Summary Page, an increase of \$4,000.00 from the original report (Image 11930026285, Attachment 3). The Committee attached a memo text to this report which stated, in part:

"...there appears to be an error in our Cash-On-Hand calculation. Mostly [sic] likely this is caused by invoices not recorded in our database..." (Image 11930026283).

On December 28, 2011, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2010 30 Day Post-General Report, received January 7, 2011. The RFAI requested clarification regarding the increase in receipts disclosed on the Amended 2009 October Quarterly Report that were not disclosed in the original filing (Image 11330017191).

2010 October Quarterly Report

On October 14, 2010, the Committee filed the original 2010 October Quarterly Report covering the period from July 1, 2010 through September 30, 2010. The report disclosed \$685,197.73 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 10991319463).

On December 20, 2010, the Committee filed an Amended 2010 October Quarterly Report. The report disclosed \$702,826.24 in disbursements on Line 17 of the Detailed Summary Page, an increase of \$17,628.51 from the original report (Image 10932121047; Attachment 4). The Committee attached a memo text to this report which stated, in part:

"...there appears to be an error in our Cash-On-Fland calculation. Mostly [sic] likely this is caused by invoices not recorded in our database..." (Image 10932121044).

On January 4, 2011, the Committee filed an Amended 2010 October Quarterly Report. The report disclosed no change in disbursements from the previous amendment (Image 11990032130).

On January 6, 2011, an RFAI was sent to the Committee referencing the Amended 2010 October Quarterly Report, received January 4, 2011. The RFAI requested clarification regarding the increase in disbursements that were not disclosed in the original filing (Image 11030532207).

On January 7, 2011, the Committee filed an Amended 2010 October Quarterly Report. The report disclosed no change in disbursements from the previous amendment (Image 11930029519).

2010 12 Day Pre-General Report

On October 20, 2010, the Committee filed the original 2010 12 Day Pre-General Report covering the period from October 1, 2010 through October 13, 2010. The report disclosed \$136,803.18 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 10931615593).

On December 20, 2010, the Committee filed an Amended 2010 12 Day Pre-General Report. The report disclosed \$262,292.94 in disbursements on Line 17 of the Detailed Summary Page, an increase of \$125,489.76 from the original report (Image 10932121317; Attachment 4). The Committee attached a memo text to this report which stated, in part:

"...there appears to be an error in our Cash-On-Hand calculation. Mostly [sic] likely this is caused by invoices not recorded in our database..." (Image 10932121314).

On January 4, 2011, the Committee filed an Amended 2010 12 Day Pre-General Report. The report disclosed no change in disbursements from the previous amendment (Image 11930014496).

On January 6, 2011, an RFAI was sent to the Committee referencing the Amended 2010 12 Day Pre-General Report, received January 4, 2011. The RFAI requested clarification regarding the substantial increase in disbursements that were not disclosed in the original filing (Image 11030532210).

On January 7, 2011, the Committee filed an Amended 2010 12 Day Pre-General Report. The report disclosed no change in disbursements from the previous amendment (Image 11930029713).

2010 30 Day Post-General Report

On December 2, 2010, Larry Golden, Treasurer, called the Reports Analysis Division (RAD) Analyst regarding the filing of the 2010 30 Day Post-General Report. Mr. Golden mentioned that he had been ill and would only be able to file a partial report that day. The Analyst stressed the importance of timely filing and accurate reporting of all activity and advised him to file an amendment as soon as possible if the Committee needed to disclose additional information (Attachment 5).

On the same day, the Committee filed the original 2010 30 Day Post-General Report covering the period from October 14, 2010 through November 22, 2010. The report disclosed \$40,424.92 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals), \$4,919.00 on Line 11(a)(ii) (Unitemized Contributions from Individuals), and \$1,249.00 on Line 11(b) (Contributions from Party Committees) of the Detailed Summary Page (Image 10992358337). The report also disclosed \$150,330.31 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 10992358339).

On December 20, 2010, the Committee filed an Amended 2010 30 Day Post-General Report. The report disclosed \$40,424.92 in receipts on Line 11(a)(i), \$5,738.67 on Line 11(a)(ii), and \$1,289.48 on Line 11(b) of the Detailed Summary Page (Image 10932121387). The report also disclosed \$280,139.67 in disbursements on Line 17 of the

Detailed Summary Page (Image 10932121389). The Committee attached a memo text to this report which stated, in part:

"...there appears to be an error in our Cash-On-Hand calculation, Mostly [sic] likely this is caused by invoices not recorded in our database..." (Image 10932121385).

On January 4, 2011, the Committee filed an Amended 2010 30 Day Post-General Report. The report disclosed \$40,667.92 on Line 11(a)(i), \$5,738.67 on Line 11(a)(ii), and \$1,289.48 on Line 11(b) of the Detailed Summary Page, a total increase in receipts of \$1,103.15 from the original report (Image 11930014810; Attachment 3). The report also disclosed \$280,382.67 in disbursements on Line 17 of the Detailed Summary Page, an increase in disbursements of \$130,052.36 from the original report (Image 11930014812; Attachment 4).

On January 6, 2011, an RFAI was sent to the Committee referencing the Amended 2010 30 Day Post-General Report, received January 4, 2011. Among other items, the RFAI requested clarification regarding the substantial increase in disbursements that were not disclosed in the original filing (Image 11030532204).

On January 7, 2011, the Committee filed an Amended 2010 30 Day Post-General Report. The report disclosed no change in receipts and disbursements from the previous amendment (Images 119300297669-71).

On December 28, 2011, an RFAI was sent to the Committee referencing the Amended 30 Day Post-General Report, received January 7, 2011. The RFAI requested clarification regarding the substantial increase in receipts that were not disclosed in the original filing (Image 11330017191).

On January 18, 2012, Mr. Golden called the RAD Analyst to discuss the recent RFAIs regarding increases in activity on the amended 2009 October Quarterly, 2010 October Quarterly, 2010 12 Day Pre-General and 2010 30 Day Post-General Reports. The Analyst explained that the issue may be referred for further action and asked if the Committee would like to provide further information regarding the matter. Mr. Golden stated he had previously responded to the omissions and had no other information to add (Attachment 5).

To date, no further communications have been received from the Committee regarding these matters.

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Carney for Congress (C00414391)

Overview of Additional Receipts

Report Name	Total Additional Receipts	Line Numbers
2009 October Quarterly Report/Amended 2009 October Quarterly Report, received 1/6/11	\$4,000.00	12
2010 30 Day Post-General Report/Amended 2010 30 Day Post-General Report, received 1/7/11	\$1,103.15	11(a)(i), 11(a)(ii), 11(b)
Was Title Total Additional Receipts	J. 19785,103.115,45	

Overview of Additional Disbursements

舞 間 - Report . lame !	Total Additional Disbursements	Line Number
2010 October Quarterly Report/Amended 2010 October Quarterly Report, received 1/7/11	\$17,628.51	17
2010 12 Day Pre-General Report/Amended 2010 12 Day Pre-General Report, received 1/7/11	\$125,489.76	17
2010 30 Day Post-General Report/Amended 2010 30 Day Post-General Report, received 1/7/11	\$130,052.36	17
total additional Debts	##\$273)170.6346.°	

Total Increase in Activity on Amended Reports: \$278,273.78

Carney for Congress (C00414391)

Additional Receipts by Line Number

2009 October Quarterly Report/Amended 2009 October Quarterly Report, received 1/6/11

Line 12: Transfers from Other Authorized Committees	\$0.00	11930026232)	\$4,000.00
Report Line	2009 October Quarterly Report (Image 29992934939)	Amended 2009 October Quarterly — Report received 1/6/11 (Image	√ariance _ Anount

2010 30 Day Post-General Report/Amended 2010 30 Day Post-General Report, received 1/7/11

Report Line		Amended 2010 30 "ay "ost-C : al Report, received 1/7/11 (Imag = 11930(2076);	Variance A pount
Line 11(a)(i): Itemized Contributions from Individuals	\$40,424.92	\$40,667.92	\$243.00
Line 11(a)(ii): Unitemized Contributions from Individuals	\$4,919.00	\$5,738.67	\$819.67
Line 11(b): Contributions from Other Political Committees	\$1,249.00	\$1,289.48	\$40.48
The second of th		Lotal Variance:	.\$1;103.15

Carney for Congress (C00414391)

Additional Disbursements by Line Number

2010 October Quarterly Report/Amended 2010 October Quarterly Report, received 1/7/11

\$685,197.73	\$702,826.24	\$17,628.51
2010 October Quarter'y Rapart (Image 10991319460)	October Quagger! 	Variance - An ount
	Amended 2010	
	Quarter's Rapart (Image 19991319460)	2010 October — October Quagrer[] Quarter y R R R Report, veceived [1/7/11 (Jmage 11930029515)]

2010 12 Day Pre-General Report/Amended 2010 12 Day Pre-General Report, received 1/7/11

Line 17: Operating \$136,803.18 Expenditures	\$262,292.94 Total Variance:	\$125,489.76
Report Line General Report (Image 10931615590)	Amended 2010 12 Day Pre-General Report, received 1/7/11 (Image 1193002-)/05;	Variance Amount

2010 30 Day Post-General Report/Amended 2010 30 Day Post-General Report, received 1/7/11

on the Section of the Common C		Total Variance:	\$130,052.36
Line 17: Operating Expenditures	\$150,330.31	\$280,382.67	\$130,052.36
_ Report Line _ ,	2010 30 Day Post- General Report (Image 199/2556334)	Amended 2010 30 Day Post-General Report, _i_iv_d_i/_i1444 11930029766)	Variance -